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MCNAIR LAW FIRM, P.A. ATTORNEYS AND COUNSELORS AT LAW

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January 23, 2006

Mr. Charles L. A. Terreni Chief Clerk/Administrator South Carolina Public Service Commission Synergy Business Park, The Saluda Building 101 Executive Center Drive Columbia, South Carolina 29210

Re: Application of Palmetto Utility Protection Services, Incorporated Requesting that the 811 Abbreviated Dialing Code Be Implemented in South Carolina

Docket No. 2005-390-C

Dear Mr. Terreni:

Enclosed for filing on behalf of the South Carolina Telephone Coalition, please find an original and (10) copies of a Petition to Intervene in the above-referenced matter. By copy of this letter and Certificate of Service, all parties of record are being served with a copy of the Petition by U. S. Mail.

Please clock in a copy of this filing and return it to us by our courier.

Thank you for your assistance.

Very truly yours, Margaret M. Pax

Margaret M. Fox

MMF/rwm Enclosures

cc: Parties of Record

BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

Docket No. 2005-390-C

| IN RE: | Application of Palmetto Utility Protection Services, |) | |
|--------|--|---|-------------|
| | Incorporated Requesting that the 811 Abbreviated |) | CERTIFICATE |
| | Dialing Code Be Implemented in South Carolina |) | OF SERVICE |
| | |) | |

I, Rebecca W. Martin, Secretary for McNair Law Firm, P. A., do hereby certify that I have this date served one (1) copy of the attached Petition to Intervene regarding the above—referenced matter on the following parties of record by causing said copy to be deposited with the United States Mail, first class postage prepaid, affixed thereto and addressed as follows:

Bonnie D. Shealy, Esquire Frank R. Ellerbe, III, Esquire Robinson McFadden Post Office Box 944 Columbia, South Carolina 29202 John M. S. Hoefer, Esquire Willoughby & Hoefer, P. A. Post Office Box 8416 Columbia, South Carolina 29202-8416

C. Jo Anne Wessinger Hill, Esquire Steven W. Hamm, Esquire Richardson Plowden Carpenter & Robinson, P. A. Post Office Drawer 7788 Columbia, SC 29202 Rhonda Dotman
Palmetto Utility Protection Service, Inc.
810 Dutch Square Boulevard
Suite 320
Columbia, South Carolina 29210

Stan Bugner Verizon Communications, Inc. 1301 Gervais Street, Suite 825 Columbia, South Carolina 29201 Florence P. Belser, Esquire Nanette S. Edwards, Esquire Office of Regulatory Staff Pot Office Box 11263 Columbia, South Carolina 29202

Rebecca W. Martin McNair Law Firm, P.A. Post Office Box 11390

Columbia, South Carolina 29211

(803) 799-9800

January 23, 2006

Columbia, South Carolina

FILE COPY

BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

Docket No. 2005-390-C

| IN RE: | Application of Palmetto Utility Protection Services, |) | |
|--------|--|---|-------------|
| | Incorporated Requesting that the 811 Abbreviated |) | PETITION TO |
| | Dialing Code Be Implemented in South Carolina |) | INTERVENE |
| | |) | |

The South Carolina Telephone Coalition ("SCTC") respectfully submits the within Petition to Intervene in the above-referenced docket. In support of its Petition, SCTC would respectfully show unto this honorable Commission:

- 1. SCTC is a coalition of incumbent local exchange telephone companies organized and doing business under the laws of the State of South Carolina. SCTC's members are telephone companies or telephone cooperatives subject to the jurisdiction of this Commission. A list of companies on whose behalf the SCTC is intervening in this matter is attached hereto as "Exhibit A."
- 2. SCTC seeks to intervene in this proceeding with full rights to participate as a party of record in so far as its interests might appear.
- 3. SCTC member companies are incumbent local exchange carriers who serve as carriers of last resort in their respective service areas. As such, SCTC member companies will be directly impacted by the implementation of the request, if granted. SCTC, therefore, has a direct and substantial interest in this proceeding and will be affected by its outcome. While SCTC has not fully developed a position on the request at this time, SCTC's position is that its participation in this proceeding will aid the Commission in a full and fair consideration and resolution of the request.

4. Correspondence and communications to SCTC with respect to this proceeding should be directed to the undersigned counsel.

WHEREFORE, the South Carolina Telephone Coalition respectfully requests that this honorable Commission permit its intervention in this proceeding as its interests might appear.

Respectfully submitted,

M. John Bowen, Jr.

Margaret M. Fox

McNair Law Firm, P.A.

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Columbia, South Carolina 29211

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ATTORNEYS FOR THE SOUTH CAROLINA TELEPHONE COALITION

Columbia, South Carolina January 23, 2006

South Carolina Telephone Coalition Member Companies

Bluffton Telephone Company, Inc.

Chesnee Telephone Company

Chester Telephone Company

Farmers Telephone Cooperative, Inc.

Ft. Mill Telephone Company, d/b/a Comporium Communications

Hargray Telephone Company, Inc.

Home Telephone Company, Inc.

Horry Telephone Cooperative, Inc.

Lancaster Telephone Company, d/b/a Comporium Communications

Lockhart Telephone Company

McClellanville Telephone Company

Norway Telephone Company

Palmetto Rural Telephone Cooperative, Inc.

Piedmont Rural Telephone Cooperative, Inc.

PBT Telecom

Ridgeway Telephone Company

Rock Hill Telephone Company, d/b/a Comporium Communications

Sandhill Telephone Cooperative, Inc.

St. Stephen Telephone Company

West Carolina Rural Telephone Cooperative, Inc.

Williston Telephone Company